

**INTERROGATORY NO. 8:**

Identify and describe any “proprietary information” that Plaintiff disclosed to BROWNELLS, INC. and KE ARMS, LLC as alleged in Paragraphs 55 and 113 of the Complaint.

**RESPONSE TO INTERROGATORY NO. 8:**

Armory disclosed the condition of the molds; financial information of Armory; that Armory was seeking investors for continued manufacturing and development; total CAV-15 MKII lower sales volume; CAV-15 MKII sales following In Range videos; its intent to use Marks MKIII and MKIV for future CAV-15 models; financial projections for future CAV-15 production and sales; drawings/ renderings of the CAV-15; the MKIII CAD renderings and functionality improvements to include several features that were included in the KEA polymer receiver; and the MKIV adjustable stock CAD renderings and functionality.

**INTERROGATORY NO. 4: (Note: This is the second Interrogatory No. 4.)**

Identify the communications you had with the Defendants relating to proprietary information as identified Paragraphs 55 and 113 of Plaintiff’s Complaint.

**RESPONSE TO INTERROGATORY NO. 4:**

Investment Packet provided in 2018.

In 2018, numerous phone calls between Shel Jones and Paul Levy and Russell Phagan regarding the marketing of Asserted Mark once it was in production, discussions included design improvements and modifications to the MKII design, and the content and execution of the Brownell NDA.

In 2016, there were numerous phone calls between Shel Jones and Paul Levy regarding the drafting and execution of the updated Brownells NDA.

